

RWQCB Oversight Reviewing Annual Pretreatment Reports

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Federal Requirement

[40 CFR 403.12(i)]

- Annual reports must contain
 - Updated list of the POTW's IUs
 - Names
 - Addresses
 - List of deletions and additions to previously submitted lists
 - Each IU's classification and applicable standards
 - List of MTCIUs
 - List of NSCIUs



Federal Requirement

[40 CFR 403.12(i)] (continued)

- Summary of each IU's compliance status
- Summary of POTW's compliance and enforcement activities
- Summary of changes to the POTW's pretreatment program
- Any other information requested by the RWQCB



Additional EPA Region 9 Annual Report Requirements

- POTW's compliance status with NPDES permit conditions
- Summary of POTW's influent and effluent monitoring of pollutants which are known or suspected to be discharged by IUs
- Any influent and effluent monitoring data for non-priority pollutants which the POTW believes may be causing interference or pass through



Additional EPA Region 9 Annual Report Requirements (continued)

- A discussion of upsets, interference, or pass through
- Summary of TTO monitoring statue for applicable IUs
- A list of the standards violated during the year by each SIU



Additional EPA Region 9 Annual Report Requirements (continued)

- SIUs in SNC
- Summary of enforcement actions Type of enforcement
 - Final compliance date
 - Amount of fines and penalties collected, if any
 - Any proposed actions to bring the SIU into compliance
- Description of any pollution prevention programs



Additional EPA Region 9 Annual Report Requirements (continued)

- Summary of the annual pretreatment budget
- Cost of the pretreatment program functions and equipment purchases
- Summary of public participation activities



Evaluating Annual Reports

- At a minimum, the reports must contain
 - Requirements as specified by the NPDES Permit
 - The Federal requirements listed in 40 CFR 403.12(i)



Why Review an Annual Report?

- Evaluate POTW's compliance with federal pretreatment program implementation requirements
 - Frequency of inspections
 - Frequency of compliance samples
 - Frequency of self-monitoring
 - Determination of SNC



Why Review an Annual Report? (continued)

- Evaluate the effectiveness of POTW's enforcement actions
 - Are enforcement actions adequate?
 - Are there a significant number of repeat violations?
 - Does the City have an approved ERP?
 - If there were violations, were there any enforcement actions?



Why Review an Annual Report? (continued)

- Aid in determining the focus of upcoming PCIs/PCAs
 - Were there any outstanding issues?
 - New CIUs?
 - Were there any deleted SIUs?
 - Significant program changes?
 - Significant reduction in staff?



So you completed your review, what now?

- Has the POTW reported everything as required?
- Has the POTW reported everything correctly?
- Has the POTW reported all program modifications?
- Were there any errors?



Questions?

